

IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT OF
MISSOURI

AXIS SURPLUS INSURANCE)	
COMPANY,)	
)	
Plaintiff/Counter-Defendant,)	
)	Cause No.: 22-cv-00328
v.)	
)	Hon. Audrey G. Fleissig
TRISTAR COMPANIES, LLC)	
)	
Defendant/Counter-Plaintiff.)	

AFFIDAVIT OF ANDREW J. CANDELA

I, Andrew J. Candela, being first duly sworn on oath, depose and state as follows:

1. I am an attorney with the law firm of Skarzynski Marick & Black LLP, counsel on behalf of AXIS Surplus Insurance Company ("AXIS") and have personal knowledge of the facts set forth herein.

2. I make this Affidavit in support of AXIS' Motion for Summary Judgment on Count I of its Amended Complaint for Declaratory Judgment and Counts I and II of TriStar Companies LLC's ("TriStar") Amended Counterclaim. I am over the age of 18 and have never been convicted of a felony

3. Attached to AXIS Statement of Undisputed Materials Facts are true and correct copies of the following documents disclosed and produced by TriStar to AXIS on August 12, 2022:

Exhibit 1: TriStar's Answers and Objections to AXIS Surplus Insurance Company's Interrogatories;

Exhibit 3:

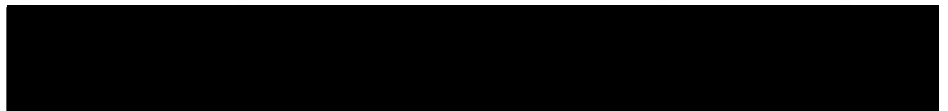


Exhibit 4:



Exhibit 8: TriStar's Responses to AXIS' Request to Admit.

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Andrew J. Candela
Andrew J. Candela

Subscribed and Sworn to before me

this 28th day of October, 2022

By: Kaitlyn E Hewson
Notary Public

